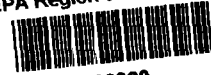




Refer to: 1630450034 - St. Clair County
Pfizer Pigments Inc.
ILD006307119
RCRA - General

EPA Region 5 Records Ctr.



390929

August 27, 1987

Mr. Roger E. Rader
Plant Manager
Pfizer Pigments, Inc.
2001 Lynch Avenue
East St. Louis, IL 62205

Dear Mr. Rader:

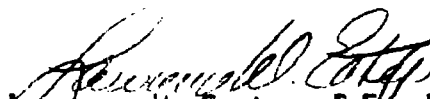
This letter is in response to your August 5, 1987 letter regarding the regulatory status of spent pickle liquor from steel operations which is used to produce iron oxide products at Pfizer Pigments, Inc.

Based on the description provided in your letter, it is the Agency's opinion that the spent pickle liquor is used as an effective substitute for a commercial product. Therefore, pursuant to 35 Ill. Adm. Code 721.102(e)(1)(B) it is not classified as a solid waste nor as a hazardous waste under RCRA when it is recycled in this manner. Furthermore, because it is not a solid waste it is excluded from regulation under 35 Ill. Adm. Code 702, 703, 705 and 722 through 726.


However, if Pfizer receives spent pickle liquor for treatment under Permit No. 1983-3-OP, the spent pickle liquor would be considered a hazardous waste, and have to be manifested to Pfizer.

If you have any questions regarding this matter, please feel free to call Rob Watson at 217/782-6762.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LIE:WRH:mab/3369g/42


CC: Southern Region
Division File
Harry Chappel
Gary King